

**HANG & ASSOCIATES, PLLC**

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November 27, 2019

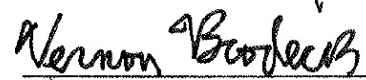
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**VIA ECF:**

Hon. Vernon S. Broderick  
United States District Court  
Southern District of New York  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Application denied as moot.

**SO ORDERED:**



HON. VERNON S. BRODERICK 12/2/2019  
UNITED STATES DISTRICT JUDGE

Re: **Wang et al. v. Shun Lee Palace Restaurant, Inc. et al.;**  
**Case No. 17-cv-840 (VSB)**

*Joint Letter re Motion to Consolidate*

Dear Judge Broderick:

Hang & Associated, PLLC (hereafter "Hang Law") is counsel to plaintiffs Li Weng, Jing Guan, Ya Qiang Zhang, Hui Min Zhao, Jun Ling Zhao, Hui Liang Zhao, Cheng Xia Wang, Ze Jun Zhang, Jun Qing Zhao, Bao Guo Zhang and Chunlin Zhang in the above referenced matter.

We write to respectfully request the Court to order the counsel for the other Plaintiffs Troy Law, PLLC (hereafter "Troy Law") to response to Hang Law's emails and co-operate to work on the consolidated complaint, which should be filed on November 29, 2019.

On November 7, 2019, Parties appeared in the Status Conference of this case. After the conference, the attorney in Troy Law, Mr. Aaron B. Schweitzer asked Hang Law to share a word version of their proposed Second Amended Complaint in the matter of *Zhang et al v. T & W Restaurant, Inc. trading as Shun Lee West et al*, so that he as the lead counsel, can propose a draft of complaint. Hang Law, with good faith, did so at the next day of November 8, 2019. (Ex. 1)

On November 18 and 19, 2019, Hang Law emailed Troy Law to follow up with the Consolidated complaint draft, and was informed that Mr. Schweitzer was in a trial. Hang Law was left no choice but to file letter motion for extension, which leads to the updated due date as November 29, 2019. (Ex. 2)

On November 25 and 26, 2019, Hang Law emailed Troy Law to inquire about the consolidated complaint, and got no reply. (Ex. 3)

Hang Law has been trying to comply with Your Honor's order with good faith, yet is not able to do so with the Troy Law's passive actions.

Given the fact that November 28 is Thanksgiving Day and November 29 is the due date for such consolidated complaint, we respectfully ask Your Honor's help, to order Troy Law to send a draft of consolidated complaint as soon as possible.

We appreciate Court's attention and time on this matter.

Very Truly Yours,

/s/ Jiajing Fan  
Jiajing Fan, Esq.  
Attorney for Plaintiff